

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RICHARD CATRAMBONE,	)	Case No. 08-cv-1655
	)	
Plaintiff,	)	Judge Andersen
	)	
v.	)	Magistrate Judge Brown
	)	
THOMAS ADAMS,	)	
	)	
Defendant.	)	

**NOTICE OF FILING**

To: Carlton E. Odim, Esq.  
Shestokas, Raines, et al.  
19 S. LaSalle St., Suite 1402  
Chicago, IL 60603

PLEASE TAKE NOTICE THAT on May 22, 2008, we caused to be filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, **PLAINTIFF'S INITIAL STATUS REPORT**, a copy of which is attached hereto and served upon you.

**RICHARD CATRAMBONE**, Plaintiff.

By: /s/ Ariel Weissberg  
One of his attorneys

Ariel Weissberg, Esq. (No. 03125591)  
Rakesh Khanna, Esq. (No. 06243244)  
Weissberg and Associates, Ltd.  
401 S. LaSalle St., Suite 403  
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T. 312-663-0004  
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**CERTIFICATE OF SERVICE**

I, Ariel Weissberg, certify that on May 22, 2008, I caused to be served Amended Notice Filing with **PLAINTIFF'S INITIAL STATUS REPORT**, to the above-named party through the District Court's ECF electronic filing system.

/s/ Ariel Weissberg

**Ariel Weissberg**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RICHARD CATRAMBONE	)	
	)	Case No. 08-cv-1655
Plaintiff,	)	
	)	
v.	)	Judge Wayne R. Andersen
	)	
	)	<b>Magistrate Judge Geraldine Soat Brown</b>
THOMAS ADAMS,	)	
	)	
Defendant.	)	

**PLAINTIFF'S INITIAL STATUS REPORT**

NOW COMES Plaintiff, by his attorneys, Ariel Weissberg, Rakesh Khanna and the law firm of Weissberg and Associates, Ltd., and as his Initial Status Report, states as follows:

1. A brief summary of the claims asserted in the complaint and any counterclaim or third party complaint.

Response:

Plaintiff asserts claims against Defendant for contribution based on the Defendant's judicial assertions in the case of *Thomas Adams v. Richard Catrambone, et al.*, Case No. 02-C-8700 that Defendant is a co-equal partner of Richard Catrambone in the business of Great Lakes Building Materials, Inc. ("Great Lakes"). There are no Counterclaims or Third Party Complaints pending.

2. A brief statement of the relief sought, including an itemization of damages.

Response:

Plaintiff is seeking a court order declaring that Defendant is obligated to pay one-half of all claims for which Richard Catrambone may be obligated relating to the business of Great Lakes. These obligations include, but are not limited to, approximately \$390,000.00 due to Wells Fargo, N.A., \$254,905.92 due to TIN, Inc., d/b/a Temple Inland; and \$95,057.00 to LaFarge North America.

3. A brief description of the matter referred to the magistrate judge.

Response:

The only matter referred to the Magistrate Judge was for discovery.

Currently, there are no pending Motions. However, on April 3, 2008, Plaintiff filed his Motion for Default Judgment, which was to be presented on April 30, 2008. On that date, Attorney Carlton Odum appeared before Judge Anderson and informed him that Defendant would file an Answer (as opposed to a Motion) on or before May 9, 2008. With this agreement, the Motion for Default Judgment was withdrawn. As of this date, no Answer was filed.

4. The status of any briefing on the matters referred.

Response:

See Response to No. 3, above.

5. If the case has been referred for discovery matters, a description of the discovery that has been completed and the future discovery contemplated, including identifying: (a) the depositions that have been taken; (b) the depositions that have been scheduled and the dates set; and (c) any other discovery contemplated.

Response:

Plaintiff anticipates the depositions of Richard Catrambone and Thomas Adams. To-date, no depositions have been taken or scheduled. In addition, Plaintiff anticipates written discovery.

6. Whether the parties will consent to trial before a magistrate judge.

Response:

No.

7. Any dates or deadlines established by the district judge for discovery cut-off, submission of pretrial order or trial.

Response:

None of these dates or deadlines have been established. However, Plaintiff recommends a written discovery cut-off deadline of September 1, 2008, an oral discovery cut-off deadline of December 1, 2008, pre-trial submissions by February 1, 2009, and a trial in March, 2009.

8. The status of settlement discussions, if any.

Response:

To-date, no settlement discussions have occurred.

9. In referral cases, list both the district judge and the magistrate judge in the caption and **circle the name of the judge for whom the filing is intended.**

Response:

No response is necessary.

**RICHARD CATRAMBONE**, Plaintiff

By: /s/ Ariel Weissberg  
One of his attorneys

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